American Chemistry Council Good Chemistry Makes It Possible

August 2, 2004

201-*16370

Oscar Hernandez,
Director, Risk Assessment Division
U.S. Environmental Protection Agency
7403 M
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: US HPV Challenge Program Response to EPA and ED Comments on Robust Summaries and Test Plans for n-Butyl Propionate (NBP)

Dear Mr. Hernandez,

The Oxo Process Panel (Panel) is pleased to respond to the comments on its n-butyl propionate submission from U.S. Environmental Protection Agency (EPA) and Environmental Defense (ED).

The following is the response to EPA's comment:

Ecological Effects. Adequate data are available for algae. However, EPA considers the acute fish and daphnia data inadequate (static tests based on nominal concentrations) based on the loss of test substance observed in the algae study. The last sentence under ECOTOXICITY on p. 4 needs to be removed.

> Panel Response
> The Panel understands the point made and will conduct the acute fish and daphnia studies following OECD guidelines. The robust summaries and test plan will be updated when the studies are completed.

The following are responses to Environmental Defense's comments:

Is NBP released into the environment from any of it uses?

> Panel Response
> The Panel has found no environmental monitoring data for any of the limited uses for n-butyl propionate.

n-Butanol is an impurity in NBP and the robust summaries indicate that this impurity occurs at <1%. Are there situations where n-butanol is found present in greater amounts?

American Chemistry Council
Good Chemistry Makes It Possible

August 2, 2004

201-16370

Oscar Hernandez,
Director, Risk Assessment Division
U.S. Environmental Protection Agency
7403 M
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: US HPV Challenge Program Response to EPA and ED Comments on Robust Summaries and Test Plans for n-Butyl Propionate (NBP)

Dear Mr. Hernandez,

The Oxo Process Panel (Panel) is pleased to respond to the comments on its n-butyl propionate submission from U.S. Environmental Protection Agency (EPA) and Environmental Defense (ED).

The following is the response to EPA's comment:

Ecological Effects. Adequate data are available for algae. However, EPA considers the acute fish and daphnia data inadequate (static tests based on nominal concentrations) based on the loss of test substance observed in the algae study. The last sentence under ECOTOXICITY on p. 4 needs to be removed.

> Panel Response
> The Panel understands the point made and will conduct the acute fish and daphnia studies following OECD guidelines. The robust summaries and test plan will be updated when the studies are completed.

The following are responses to Environmental Defense's comments:

Is NBP released into the environment from any of it uses?

> Panel Response
> The Panel has found no environmental monitoring data for any of the limited uses for n-butyl propionate.

n-Butanol is an impurity in NBP and the robust summaries indicate that this impurity occurs at <1%. Are there situations where n-butanol is found present in greater amounts?

Panel Response
No. Current manufacturing specifications are for an n-butyl propionate concentration of >99.5%. n-butyl propionate with n-butanol level of >1% would be considered off-specification.

Available studies indicate that NBP is biodegraded to some extent. Are there any data on its presence or absence in environmental media?

Panel Response
The Panel has found no environmental monitoring data for any of the limited uses for n-butyl propionate.

The Panel is in the process of completing stability in water, photodegradation, and transport and distribution evaluations for NBP. We will update the robust summary/test plan accordingly.

If you have any questions about these responses, please contact me at (703) 741-5609. Thank you.

Sincerely,

Barbara Francis,
Managing Director, CHEMSTAR

cc: Richard Denison, Environmental Defense